

EXHIBIT E

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15 **Attorneys for Defendants Technicolor SA
and Technicolor USA, Inc.**

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 **IN RE CATHODE RAY TUBE (CRT)**
21 **ANTITRUST LITIGATION,**

No. 07-cv-5944-SC
MDL No. 1917

22 This Document Relates to:

**STIPULATION REGARDING
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

23 *Alfred H. Siegel v. Technicolor SA, et al.,*
24 *No. 13-cv-05261-SC*

25 *Sears, Roebuck and Co., et al. v. Technicolor*
26 *SA, et al., No. 13-cv-05262-SC*

27 *Best Buy Co., Inc., et al. v. Technicolor SA,*
28 *et al., No. 13-cv-05264-SC*

29 *Target Corp. v. Technicolor SA, et al., No.*
30 *13-cv-5686-SC*

1 In accordance with Civil Local Rules 3-12 and 7-11 of this Court, Plaintiffs Alfred H. Siegel
 2 (as Trustee of the Circuit City Stores, Inc. Liquidating Trust), Sears, Roebuck and Co., Kmart
 3 Corp., Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy
 4 Stores, L.P., BestBuy.com, LLC, Magnolia Hi-Fi, LLC, and Target Corp. (all collectively,
 5 “Plaintiffs”) enter into this Stipulation with Defendants Technicolor SA¹ (f/k/a Thomson SA) and
 6 Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.) (collectively the “Thomson
 7 Defendants”) and Mitsubishi Electric Corporation, Mitsubishi Electric Visual Solutions America,
 8 Inc., and Mitsubishi Electric & Electronics USA, Inc. (collectively the “Mitsubishi Electric
 9 Defendants”) concerning the matters entitled *Alfred H. Siegel v. Technicolor SA, et al.*, Case No.
 10 13-cv-05261-SC, *Sears, Roebuck and Co., et al. v. Technicolor SA, et al.*, Case No. 13-cv-05262-
 11 SC, *Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, Case No. 13-cv-05264-SC, and *Target Corp.*
 12 *v. Technicolor SA, et al.*, Case No. 13-cv-05686-SC.

13 SUBJECT TO THE COURT’S APPROVAL, THE PARTIES STIPULATE AND AGREE
 14 AS FOLLOWS:

15 WHEREAS, on November 12, 2013, Plaintiff Alfred H. Siegel filed a complaint entitled
 16 *Alfred H. Siegel v. Technicolor SA, et al.*, Case No. 13-cv-05261-SC, alleging antitrust claims
 17 against the Thomson Defendants and Mitsubishi Electric Defendants in United States District Court
 18 for the Northern District of California;

19 WHEREAS, on November 13, 2013, Plaintiffs Sears, Roebuck and Co. and Kmart Corp.
 20 filed a complaint entitled *Sears, Roebuck and Co., et al. v. Technicolor SA, et al.*, Case No. 13-cv-
 21 05262-SC, alleging antitrust claims against the Thomson Defendants and Mitsubishi Electric
 22 Defendants in United States District Court for the Northern District of California;

23 WHEREAS, on November 13, 2013, Plaintiffs Best Buy Co., Inc., Best Buy Purchasing
 24 LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., BestBuy.com, LLC, and Magnolia
 25 Hi-Fi, LLC filed a complaint entitled *Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, Case No.

26 ¹ By joining in this Stipulation, Thomson SA does not waive its right to assert any defense to any
 27 claim asserted by the Plaintiffs, including, without limitation, that Thomson SA is not subject to the
 personal jurisdiction of this Court.

1 13-cv-05264-SC, alleging antitrust claims against the Thomson Defendants and Mitsubishi Electric
2 Defendants in United States District Court for the Northern District of California;

3 WHEREAS, on December 9, 2013, Plaintiff Target Corp. filed a complaint entitled *Target*
4 *Corp. v. Technicolor SA, et al.*, Case No. 13-cv-05686-SC, alleging antitrust claims against the
5 Thomson Defendants and Mitsubishi Electric Defendants in United States District Court for the
6 Northern District of California; and

7 WHEREAS, pursuant to Civil Local Rule 3-12(a), each of Plaintiffs' complaints against the
8 Thomson Defendants and Mitsubishi Electric Defendants are related to the cases being adjudicated
9 in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 07-cv-5944-SC (MDL No. 1917).

10 NOW, THEREFORE, PURSUANT TO LOCAL RULE 7-11, THE PLAINTIFFS, THE
11 THOMSON DEFENDANTS, AND THE MITSUBISHI ELECTRIC DEFENDANTS, BY AND
12 THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS
13 FOLLOWS

14 1. The Plaintiffs' complaints filed in *Alfred H. Siegel v. Technicolor SA, et al.*, Case
15 No. 13-cv-05261-SC; *Sears, Roebuck and Co., et al. v. Technicolor SA, et al.*, Case No. 13-cv-
16 05262-SC; *Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, Case No. 13-cv-05264-SC; and *Target*
17 *Corp. v. Technicolor SA, et al.*, Case No. 13-cv-05686-SC should be related to *In re Cathode Ray*
18 *Tube (CRT) Antitrust Litigation*, Case No. 07-cv-5944-SC (MDL No. 1917).

19 **IT IS SO STIPULATED.**

Dated: January 7, 2013

Respectfully submitted,

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Pursuant to Local Rule 5-1(i)(3), the filer attests that concurrence in the filing of this document has been obtained from the above signatories.

Dated: January 7, 2013

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